



SEECOM

Southeast Emergency Communications



Via Electronic Comment Filing System

October 16, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Ms. Dortch:

As the Executive Director of a consolidated regional emergency communications center and long-time Public Safety Telecommunicator (PST), I would like to submit comments to provide an operational perspective on the type of location information needed by 9-1-1 professionals and other first responders to best carry out our mission to answer the call and send the necessary response to protect and save lives.

Our emergency communications center, Southeast Emergency Communications, is located approximately 55 miles northwest of Chicago, encompassing 100+ square miles with a residential population of 215,000 residents. Staff receives approximately 40,000 9-1-1 calls annually, of which nearly 80% are from wireless devices.

Vertical location information for 9-1-1 callers from inside buildings could significantly improve emergency responses on a daily basis. The location information must be actionable. This means, our Public Safety Telecommunicators can quickly use it to assist the caller and direct responders to the scene. A "dispatchable location," as defined by the FCC, remains the gold standard from an operational perspective. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated floor number.

A raw vertical estimate is of little operational value if it is relative to height above mean sea level (AMSL) or above ground level (AGL). Emergency Communications Centers like mine simply do not have the resources to create and maintain indoor maps for buildings in our jurisdiction. Nor do we have the resources to translate AMSL or AGL to a floor, or visualize a three-dimensional point in space. Providing a height estimate to our field responders is simply not feasible. At a minimum, 9-1-1 professionals need a floor number estimate (e.g., "3rd floor" rather than "10 meters AMSL") to ensure that responders arrive as quickly as possible. Accordingly, as you contemplate rules for a z-axis metric, please consider requiring wireless carriers to provide a floor number as part of the z-axis information. Requiring wireless carriers to provide actionable location information about 9-1-1 callers will undoubtedly save lives.

Regards,

Jason E. Kern, CPE
Executive Director